

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARGERY KAIN,

Plaintiff,

v.

LIBERTY MUTUAL GROUP INC.

Defendant.

CIVIL ACTION NO. 22-10436-RGS

**DEFENDANT’S ASSENT TO PLAINTIFF’S MOTION TO CONTINUE
THE TRIAL DATE**

Defendant Liberty Mutual Group Inc. (“Liberty Mutual”) assents to Plaintiff’s Motion to Continue the Trial Date. In support of this assent, Liberty Mutual states the following:

1. Liberty Mutual assents and has no objection to Plaintiff’s request to continue the trial date in light of Plaintiff’s counsel’s prior familial obligations. Those are important obligations.

2. Liberty Mutual agrees with Plaintiff’s suggestion that the parties and the Court work together to find a new mutually agreeable trial date, as soon after May 20th as possible. Liberty Mutual will have several out-of-state witnesses testifying at this trial, and it is coordinating their availability for this trial.

3. For the above reasons, Liberty Mutual assents to Plaintiff’s Motion to Continue the Trial Date and welcomes the opportunity to work together to set a new trial date soon as possible.

Respectfully Submitted,

LIBERTY MUTUAL GROUP INC.

By its attorneys,

/s/ Mark H. Burak

Mark H. Burak (BBO #558805)

Andrea M. Sullivan (BBO #569280)

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

One Boston Place, Suite 3500

Boston, MA 02108

Telephone: 617.994.5700

Facsimile: 617.994.5701

mark.burak@ogletreedeakins.com

andrea.sullivan@ogletreedeakins.com

Dated: March 25, 2024

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on this 25th day of March 2024.

/s/ Andrea M. Sullivan

Andrea M. Sullivan